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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

June 5, 1997

Mr. Lloyd Piper  
U.S. Department of Energy  
825 Jadwin, MSIN: A7-50  
Richland, WA 99352

Mr. Henry J. Hatch  
Fluor Daniel Hanford, Inc.  
2420 Stevens Ctr., MSIN: H5-20  
Richland, WA 99352

Mr. David B. Van Leuven  
Rust Federal Service of Hanford, Inc.  
P.O. Box 700, MSIN: H6-10  
Richland, WA 99352



Dear Messrs. Piper, Hatch, and Van Leuven:

Re: Status of Corrective Measures at the 222-S Laboratory Complex per March 25, 1997, Notice of Correction

The Washington State Department of Ecology (Ecology) issued a Notice of Correction to the U.S. Department of Energy (USDOE), Fluor Daniel Hanford, Inc. (FDH), and Rust Federal Services of Hanford, Inc. (RFS) on March 25, 1997. The Notice of Correction identified three violations of the Washington Administrative Code (WAC), Chapter 173-303, Dangerous Waste Regulations at the 222-S Laboratory Complex on the Hanford Site. The Notice of Correction established three corrective measures to resolve the outstanding violations by April 9, 1997.

Ecology has received USDOE, FDH, and RFS's April 9, and April 28, 1997, letters documenting 47259 actions taken to complete the Corrective Measures listed in the Notice of Correction. Also, Ecology met with USDOE, FDH, and RFS on March 31, April 4, and April 25, 1997, to clarify Ecology's expectations for completion of the corrective measures. This letter documents acceptance or rejection of the actions taken to complete each corrective measure, or parts thereof, based on information transmitted to Ecology in these letters and meetings. Enclosure er provides detailed comments of Ecology's review of the information supplied by USDOE, FDH, and RFS during the aforementioned meetings and letters. This letter also grants extensions for time to complete specific corrective measure actions where appropriate and establishes timelines

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for completion of corrective measures, or parts thereof, found to be insufficient to meet requirements of Ecology's March 25, 1997, Notice of Correction. The enclosure also provides clarification of statements made in USDOE, FDH and RFS's April 9 and 28, 1997 letters. USDOE, FDH, and RFS's April 9 and 28 1997 letters are used as reference for the comments expressed in the enclosure.

Corrective Measure #1, Accumulating Dangerous Waste On-Site.

This Corrective Measure required the provisions of WAC 173-303-200 (1) be applied to satellite accumulation areas within the 222-S Laboratory Complex. The actions described in USDOE, FDH, and RFS's April 9, 1997, letter to complete this corrective measure are acceptable subject to the conditions listed under Corrective Measure #1 in the attachment to this letter.

Corrective Measure #2, Requirements for Generators of Dangerous Waste.

This Corrective Measure required testing per WAC 173-303-070 (4) of all liquid mixed waste streams generated within the 222-S Laboratory Complex to ensure all these wastes are accurately described in laboratory waste information documents such as waste stream fact sheets. The Notice of Correction requires testing of the wastes after an accurate description of each waste stream is developed for each waste stream to ensure these descriptions are accurate. To complete this corrective measure Ecology will require further clarifications of the actions described in USDOE, FDH and RFS's April 9, 1997, letter and subsequent meetings as described per the enclosure, under Corrective Measure #2.

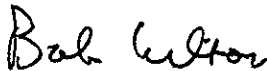
Corrective Measure #3, General Waste Analysis.

This Corrective Measure required an addendum to the 219-S waste analysis plan to specify waste verification parameters and procedures prior to acceptance of waste into the 219-S tank system. USDOE, FDH, and RFS issued a letter to Ecology on April 28, 1997, describing the parameters and procedures proposed to meet the requirements of this corrective measure. The actions described in this letter to complete this corrective measure with regard to acceptance into the 219-S tank system of waste generated outside the 222-S Laboratory Complex or from off the Hanford Site are inadequate and will be addressed in future meetings with USDOE, FDH, and RFS and future correspondence by Ecology. Until this matter is resolved, waste generated outside of the 222-S Laboratory Complex may not be accepted for transfer into the 219-S tank system without prior approval by Ecology on a case by case basis. Further direction for completion of the corrective measure is given in the enclosure as listed under Corrective Measure #3.

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If you have any questions or concerns regarding this letter, please contact me at (509) 736-3031.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob Wilson".

Bob Wilson, Compliance Inspector  
Nuclear Waste Program

BW:rb

cc: Tom Teynor, USDOE  
William Adair, FDH  
Duane Renberger, RFS  
Mary Lou Blazek, ODOE  
Steve Szendre, FDH  
Administrative Record: 222-S Laboratory Complex and 219-S Tank System